

May 7, 2007

Via Hand Delivery

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Twelfth Annual Report and Analysis of Competitive Market Conditions with
Respect to Commercial Mobile Services
WT Docket No. 07-71**

Dear Ms. Dortch:

In the above-referenced proceeding, the Wireless Telecommunications Bureau (“WTB”) is soliciting data and information to assist in the preparation of its *Twelfth Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services* (“*Twelfth Annual Report*”).¹ Among other things, the WTB seeks data on the following from providers of Mobile Satellite Services (“MSS”): service price, handset price, and coverage. *Public Notice* at 4.

Mobile Satellite Ventures Subsidiary LLC (“MSV”) was authorized by the Commission in 1989 to construct, launch, and operate an MSS system in the L band.² MSV has joined in two separate comments filed today in this proceeding, one regarding the provision of MSS³ and one regarding MSS supplemented with in-band terrestrial facilities, called an Ancillary Terrestrial Component (“ATC”).⁴ MSV’s licensed satellite (called “AMSC-1”) was launched in 1995, and MSV began offering service in 1996. Today, MSV offers a full range of mobile satellite services, including voice and data, using both its own U.S.-licensed satellite and the Canadian-licensed L band satellite licensed to Mobile Satellite Ventures (Canada) Inc. (“MSV Canada”).

¹ See *WTB Seeks Comment on CMRS Market Competition*, DA 07-1652, WT Docket No. 07-71 (April 6, 2007) (“*Public Notice*”).

² *Order and Authorization*, 4 FCC Rcd 6041 (1989); *remanded by Aeronautical Radio, Inc. v. FCC*, 928 F.2d 428 (D.C. Cir. 1991); *Final Decision on Remand*, 7 FCC Rcd 266 (1992); *aff’d*, *Aeronautical Radio, Inc. v. FCC*, 983 F.2d 275 (D.C. Cir. 1993); *see also AMSC Subsidiary Corporation, Memorandum Opinion and Order*, 8 FCC Rcd 4040 (1993).

³ See Comments of the Satellite Industry Association, WT Docket No. 07-71 (May 7, 2007).

⁴ See Comments of MSS Providers, WT Docket No. 07-71 (May 7, 2007).

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MSV currently provides switched and packet data services to approximately 30,000 units (including 11,000 mobile data units) through a retail sales channel that includes a direct sales force, dealers, and resellers. Many of these users are federal, state, and local agencies involved in public safety and security that depend on the MSV system for redundant and ubiquitous wireless services during daily operations and in the case of emergencies. Attached as Exhibit A is price and coverage information for the services that MSV offers directly to end user consumers. In addition to services provided directly to end users, MSV also sells bulk capacity on a wholesale basis to service provider partners that in turn provide services directly to end user customers. There are approximately 170,000 units in service on the MSV system through these indirect channels. The information in Exhibit A does not reflect information regarding service and equipment offered to the public by these third parties.

In addition, as explained in separate comments filed today, MSV is also in the process of constructing two next-generation MSS satellites which will be supplemented with ATC. These satellites will be used to provide advanced mobile broadband services to devices that are virtually identical to cell phone handsets in terms of aesthetics, cost, and functionality. MSV is ahead of the Commission's milestone schedule and is planning to launch these satellites beginning in 2009.

Very truly yours,

/s/Jennifer A. Manner

Jennifer A. Manner

Vice President, Regulatory Affairs

MOBILE SATELLITE VENTURES SUBSIDIARY LLC

10802 Parkridge Boulevard

Reston, Virginia 20191

cc: Ben Freeman, FCC
Heidi Kroll, FCC

Exhibit A

I. Prices of MSS Offered by MSV Directly to End User Customers

A. Retail Telephony Rates

Charges Per Satellite Radio Telephony - Rate Plan Code	915	916	914	913
Monthly Access Fee	\$25	\$35	\$100	\$175
Minutes Included	0	30	60	175

B. Retail Push-to-Talk (“PTT”) Rates

Charges Per Satellite Radio	Regional 2-beams	CONUS 3-beams	All Regions 5-beams
PTT - Rate Plan Code	908	928	929
Talk group access/month	\$69	\$99	\$129
PTT minutes	Unlimited	Unlimited	Unlimited
Telephony Minute rate	\$1.19	\$1.19	\$1.19

II. Data on Prices for MSS Handsets Currently Offered by MSV to End Users

MSAT-G2 Mobile Satellite Radio = \$4,800

III. Data on MSV’s MSS Coverage

MSV provides wide-area wireless communications on land, sea or in the air, in North America, Central America, northern South America (Venezuela and Colombia), and the Caribbean and up to 250 miles offshore.

IV. Data on Number of Subscribers for MSS Offered Directly by MSV to End User Customers

Subscribers = 19,440 (not including mobile data subscribers)